

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Chapter 7</b>
	:	
<b>JAMES FITZGERALD BOWYER,</b>	:	<b>Case No. 19-13113(MDC)</b>
	:	
<b>Debtor.</b>	:	
<b>THE KIM LAW FIRM LLC and RICHARD KIM,</b>	:	
	:	
<b>Plaintiffs,</b>	:	
	:	
<b>v.</b>	:	<b>Adv. No. 19-00200(MDC)</b>
	:	
<b>JAMES FITZGERALD BOWYER,</b>	:	
	:	
<b>Defendant.</b>	:	
	:	

**MOTION OF DEFENDANT JAMES FITZGERALD  
BOWYER TO SET ASIDE THE ENTRY OF DEFAULT**

Defendant James Fitzgerald Bowyer, by and through his attorneys, Kenny, Burns & McGill, respectfully moves this Honorable Court pursuant to Rule 7055 of the Rules of Bankruptcy Procedure which incorporates Rule 55 of the Federal Rules of Civil Procedure to set aside the entry of default. The grounds for this Motion are more fully set forth in the accompanying Memorandum

of Law, which Defendant hereby incorporates by reference.

Respectfully submitted,

**KENNY, BURNS & MCGILL**

/s/Thomas D. Kenny

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Attorneys for Defendant

James Fitzgerald Bowyer

Dated: August 6, 2021